

From: [ANDERSON Jim M](#)
To: [Kristine Koch/R10/USEPA/US@EPA](#); [Eric Blischke/R10/USEPA/US@EPA](#)
Cc: [Eric Blischke/R10/USEPA/US@EPA](#); [MCCLINCY Matt](#)
Subject: RE: Table 5.1-2
Date: 10/28/2008 01:17 PM

Eric & Kristine,

Yes, I agree..., I think we're very close to finalizing our comments, & I'd really get to get them done & not review this document again. However, I still have several comments on both the General Comments & the Site-Specific Comments.

General Comments

1) Revised Presentation Format- Bullet 5- DEQ does not agree with the statement "Since there may be many more sites that have had historical releases of significance or current sources that are unknown..." We believe we have identified & are addressing most all sites with historic significant releases, & that it is unlikely there are "many more" left. We think the majority of these currently unidentified significant release sites &/or current sources are likely connected to the river via the stormwater pathway. One of DEQ's major source control focus identifying, evaluating & controlling the stormwater pathway. We agree with EPA's suggestion that the LWG should include both all upland sites immediate adjacent to the river in the Portland Harbor (PH) study area & sites in the PH drainage basin where there have been historic releases as part of the revised table. DEQ suggests the introductory phase "Since there may be many more sites...that are unknown," be dropped from EPA's comment.

2) Revised Presentation Format- Bullet 7- DEQ does not agree with EPA's comment stating "Sites without groundwater data and for which subsurface releases are possible should be designated as insufficient information, c". In some cases, I think we can reach a GW SCD without GW data based on the vertical extent of subsurface soil contamination. For instance if the water table is 15'bgs, but the historic, subsurface soil contamination only extends to <5'bgs, I don't think we need GW data to make that GW SCD. DEQ's concern can be addressed by starting EPA's cited text with the word "Generally,".

3) Revised Presentation Format- Bullet 3- In the parenthesized phrase in the last sentence of the comment, we suggest you change the "source" to "pathway".

4) Typos- 1) spell all acronyms with their 1st use. 2) be consistent with the use of "over water" vs "overwater" in Bullet 3.

Site-specific Comments

- 1) Comment 138 (Front Ave LP); Comment 145 (KM Linnton); Comment 151 (McCall Oil); Comment 157 (T4 ASA) & Comment 168 (NuStar)- Again, what is the basis for the historic overwater pathway to be classified as "b" rather than "c"?
- 2) Comment 139 (Gasco)- It's still unclear to DEQ what EPA means by "footnotes"... do you mean "LWG Recommendations"? If so, perhaps you should change the text to read: "The data review necessary for EPA & DEQ to concur with "LWG Recommendations" regarding the limited and/or specific VOC and SVOC chemicals detected was determined by EPA to be an unnecessary expenditure of resources at this time."
- 3) Comment 143 (Gunderson)- DEQ agrees with EPA to drop PCBs as a GW COI, but that's not what's currently reflected in the text.
- 4) Comment 146 (LOFTG)- DEQ understands the LOFTG facility does not front the river, so in that sense the riverbank erosion pathway should be "N/A". Overland runoff &/or stormwater from LOFTG was likely transported offsite onto the neighboring BPA property, which does have river frontage. However, the riverbank & beach at the BPA property contains very low levels of COIs, so DEQ would classify riverbank erosion at BPA as "d".
- 5) Comment 158 T4, Slip 1)- For some reason the LWG is grouping overwater activities on the north side of Slip 3 (Kinder Morgan's soda ash loading) as part of Slip 1. That said, I think EPA should default to your general comment on current overwater activities, rather than say current is "d".

Thanks, & keep up the great work.

Jim Anderson

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-----Original Message-----

From: Koch.Kristine@epamail.epa.gov

[<mailto:Koch.Kristine@epamail.epa.gov>]

Sent: Tuesday, October 28, 2008 8:50 AM

To: Blischke.Eric@epamail.epa.gov

Cc: ANDERSON Jim M; blischke.eric@epa.gov
Subject: Re: Table 5.1-2

Eric and Jim - Here are my edits/comments. I agree - we're getting closer.

(See attached file: Table5.1-2Comments102808KK.doc)

Kristine Koch

Remedial Project Manager

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Eric

Blischke/R10/USE

PA/US

To

Kristine

Koch/R10/USEPA/US@EPA

10/27/2008 02:29

cc

PM

ANDERSON.Jim@deq.state.or.us,

blischke.eric@epa.gov

Subject

Re: Table 5.1-2(Document

link:

Kristine

Koch)

Ok - I took another cut at this - editing some of Kristines general comments, incorporating some of Jim's comments and adding some of my own thoughts. Here is yet another version. It's tedious to go through this I know but I believe we are getting close.

Eric

[attachment "Table5.1-2Comments102708EB.doc" deleted by Kristine Koch/R10/USEPA/US]

Kristine

Koch/R10/USEPA/U

S

To

blischke.eric@epa.gov,

10/24/2008 01:39

ANDERSON.Jim@deq.state.or.us

PM

cc

Subject

Table 5.1-

2

Eric and Jim - I have pulled together both of your sets of comments and my own. Please review this and see if you agree. I highlighted a couple I was not sure if they were correct, but you should really look them all over and be sure that we are all in agreement with the statements.

[attachment "kochComments to LWG_Response to EPA comments on Table 5.1-2.doc" deleted by Eric Blischke/R10/USEPA/US]

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